

**The Information Commissioner's response to the Financial Conduct Authority's consultation on Mortgage customers: proposed changes to responsible lending rules and guidance**

The Information Commissioner has responsibility for promoting and enforcing the EU General Data Protection Regulation ('GDPR'), the Data Protection Act 2018 ('DPA'), the Freedom of Information Act 2000 ('FOIA'), the Environmental Information Regulations 2004 ('EIR') and the Privacy and Electronic Communications Regulations 2003 ('PECR'). She is independent from government and upholds information rights in the public interest, promoting openness by public bodies and data privacy for individuals. The Commissioner does this by providing guidance to individuals and organisations, solving problems where she can, and taking appropriate action where the law is broken.

The Commissioner welcomes the opportunity to respond to the Financial Conduct Authority's consultation on Mortgage customers: proposed changes to responsible lending rules and guidance.

We have reviewed the consultation paper and identified that the current focus of many of the questions do not specifically require data protection input at this point. However, there are aspects of the proposed changes to the responsible lending rules and guidance that may have implications for the privacy of individuals, depending on the nature of these changes, the obligations placed upon lenders and how individuals' personal data is to be used.

The ICO would therefore welcome the opportunity to engage with the FCA, and relevant stakeholders involved, to discuss the data protection and privacy implications resulting from the proposed changes.